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7 Attorney for Albert Raul Franco

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 ALBERT RAUL FRANCO,
15 Defendant.

Case No. 2:18-cr-00356-APG-DJA

**STIPULATION TO CONTINUE
COMPASSIONATE RELEASE
MOTION SUPPLEMENT
DEADLINES
(First Request)**

16 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
17 Trutanich, United States Attorney, and Simon F. Kung, Assistant United States Attorney,
18 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
19 and Kathryn C. Newman, Assistant Federal Public Defender, counsel for Albert Raul Franco,
20 that the deadline to supplement Defendant's Motion for Compassionate Release be extended to
21 November 16, 2020 and that the deadline for the government's response be extended to
22 December 2, 2020 .

23 This Stipulation is entered into for the following reasons:

24 1. Defense counsel needs additional time to discuss the matter with the client and
25 collect necessary information to supplement client's pro se Motion.
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2. In exchange for the stipulation for additional time, government counsel requested that the time within which to respond be similarly extended.

3. The defendant is in custody and agrees with the need for the continuance.

4. The parties agree to the continuance.

This is the first request for a continuance of the Compassionate Release Motion Supplement deadlines.

DATED this 2nd day of November, 2020.

RENE L. VALLADARES
Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

By /s/ Kathryn C. Newman

KATHRYN C. NEWMAN
Assistant Federal Public Defender

By /s/ Simon F. Kung

SIMON F. KUNG
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ALBERT RAUL FRANCO,

7 Defendant.
8

Case No. 2:18-cr-00356-APG-DJA

ORDER

9
10 IT IS THEREFORE ORDERED that the deadline to supplement Defendant's Motion
11 for Compassionate Release be extended to November 16, 2020 and that the deadline for the
12 government's response be extended to December 2, 2020 .

13 DATED this 2nd day of November, 2020.

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15 _____
16 UNITED STATES DISTRICT JUDGE
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